18

INTERVENTION

BEFORE THE ARIZONA CORPORATION EOMI.

1 2

JEFF HATCH-MILLER

WILLIAM A. MUNDELL

MIKE GLEASON

BARRY WONG

KRISTIN K. MAYES

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

3

4

5

6 7

8

9 10

11

12

13

14

15

16 17

18

19

20 21

22

23

24

2006 AUG 18 P 2: 59

AZ CORP COMMISSION DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF UNS GAS, INC. FOR THE ESTABLISHMENT OF JUST AND REASONABLE RATES AND CHARGES DESIGNED TO REALIZE A REASONABLE RATE OF RETURN ON THE FAIR VALUE OF THE PROPERTIES OF UNS GAS, INC. DEVOTED TO ITS **OPERATIONS THROUGHOUT THE STATE** OF ARIZONA.

Docket No. G-04204A-06-0463

Arizona Corporation Commission DOCKETED

AUG 182006

DOCKETED BY

RUCO'S APPLICATION TO INTERVENE

1.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

11.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461, et seq., for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to Section 40-254 in proceedings relating to rate making or rate design and involving public service corporations.

IV.

The residential utility consumers will be directly and substantially affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and proper that RUCO intervene in the proceeding.

V.

In order to fulfill its statutory obligation to protect the residential utility consumers of this State, RUCO must thoroughly examine the materials presented by the Company, and must cross-examine witnesses appearing on behalf of the Company and any other parties. Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted by the Commission in this matter.

VI.

The name, mailing address, and telephone number of the person upon whom service of all documents is to be made is:

•	
2	
3	
4	
5	
6	
7	
8	
9	
10	AN of th
11	of A
12	Doc Ariz
13	120 Pho
14	СО
15	mai
16	 Lyn Chi
17	Hea Ariz
18	120 Pho
19	Chr
20	Leg Ariz
21	120 Pho
22	
23	

24

Scott S. Wakefield Chief Counsel Residential Utility Consumer Office 1110 West Washington, Suite 220 Phoenix, Arizona 85007 (602) 364-4839

RESPECTFULLY SUBMITTED this 18th day of August, 2006

Scott S. Wakefield Chief Counsel

- AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 18th day of August, 2006 with:
- 12 Docket Control
 Arizona Corporation Commission
 13 1200 West Washington
 Phoenix. Arizona 85007
 - COPIES of the foregoing hand delivered/ mailed this 18th day of August, 2006 to:
- Chief Administrative Law Judge
 Hearing Division
 Arizona Corporation Commission
 1200 West Washington
 Phoenix, Arizona 85007
 - Christopher Kempley, Chief Counsel Legal Division Arizona Corporation Commission 1200 West Washington Phoenix, Arizona 85007

Ernest Johnson, Director Utilities Division Arizona Corporation Commission 1200 West Washington Phoenix, Arizona 85007

Michael W. Patten, Esq. Roshka, DeWulf & Patten, PLC 400 East Van Buren Street Suite 800 Phoenix, Arizona 85004

Ernestine Gamble

Secretary to Scott Wakefield